

REMARKS

Claims 1-20 are pending in the present application. Claims 1, 11, and 16 were amended. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 112, Definiteness

Claims 16-20 were rejected under 35 U.S.C. § 112, second paragraph, for failing to particularly point out and distinctly claim the subject matter which Applicant claims as the invention.

Specifically, the Examiner noted the presence of several grammatical errors in claim 16 and that it was not clear whether the work and item are considered to be part of the claimed invention. In response, Applicant has amended claim 16 to correct the grammatical errors and to clarify the language of that claim. In particular, Applicant has inserted "adapted to" language into claim 16 to indicate that the work and item are not themselves considered to be part of the claimed invention. As claims 17-20 were rejected solely on the basis of their dependency on rejected claim 16, Applicant respectfully submits that his amendments to claim 16 are sufficient to overcome the rejection of claims 17-20 as well as claim 16.

Applicant therefore submits that claims 16-20, as amended, fulfill the requirements of 35 U.S.C. § 112, second paragraph, and respectfully requests that the rejection of claims 16-20 under 35 U.S.C. § 112, second paragraph be withdrawn.

II. 35 U.S.C. § 102, Anticipation

The Examiner has rejected claims 1-3 and 9-12 under 35 U.S.C. § 102 as being anticipated by *Anthony* (U.S. Patent No. 4,391,053). This rejection is respectfully traversed.

Specifically, the Examiner stated:

Anthony discloses an apparatus for framing a work comprising frame 48 (Figure 7), first mat 46 having openings, second mat 40 having a plurality of slits (Figure 9), and mount board 60 positioned to hold the mats and frame in place. First mat 46 is held in place by mounting points 74 (Figure 7). The work to be framed is threaded through slits (such as 80, 81) then mounted in the frame

with the other mat. The work is considered to be a greeting card. [Office Action, Nov. 7, 2005, at 3-4].

Without necessarily agreeing with the Examiner's argument, Applicant has amended the independent claims, claims 1 and 11, to include the additional limitation "wherein an entire length of an edge of the work is threaded through at least one of the plurality of slits." This additional language clearly distinguishes Applicant's invention from the cited *Anthony* reference, as the slits (ref. nos. 80 & 11) described in *Anthony* are adapted to receive only a corner of a rectangular work and do not accommodate an entire length of an edge of a work, as claimed by Applicant (compare with slits 304 & 305 in Figure 3 of the present application, for example). Therefore, *Anthony* does not anticipate claims 1 and 11, at least as currently amended by Applicant.

Claims 2-3, 9-10, and 12, being dependent claims that depend from independent claims 1 and 11 are also patentable over the cited *Anthony* reference, at least by virtue of their dependency on independent claims 1 and 11. Accordingly, Applicant respectfully requests that the rejection of claims 1-3 and 9-12 under 35 U.S.C. § 102 be withdrawn.

III. 35 U.S.C. § 103, Obviousness

The Examiner has rejected claims 4-8 and 13-20 under 35 U.S.C. § 103 as being obvious in view of *Anthony* (U.S. Patent No. 4,391,053) and *Plumly* (U.S. Patent No. 5,524,373). This rejection is respectfully traversed.

Claims 4-8 and 13-20 are dependent claims that depend from independent claims 1 and 11. Applicants respectfully submit that *Plumly* fails to cure the deficiencies of the *Anthony* reference with respect to the claimed slits in independent claims 1 and 11, at least as amended by Applicant. Consequently, claims 4-8 and 13-20 are patentable over the cited references for the same reasons as set forth above by Applicant with respect to independent claims 1 and 11. Therefore, Applicant respectfully requests that the rejection of claims 4-8 and 13-20 under 35 U.S.C. § 103 be withdrawn.

IV. 35 U.S.C. § 103, Obviousness

It is respectfully urged that the subject application is patentable over *Anthony* and *Plumly* and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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